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March 17, 2005

ELECTRONICALLY FILED

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Implementation of Section 629 of the Communications Act:
Commercial Availability of Navigation Devices, CS Docket
No. 97-80; Requirements for Digital Television Receiving
Capability, ET Docket No. 05-24**

Dear Ms. Dortch:

On behalf of TTE Corporation, the manufacturer of RCA television products, the undersigned, together with Dave Arland, Vice President, Communications and Government Affairs, Connectivity Business Unit, Thomson Inc., and Bharath Rajagopalan, PhD, General Manager, North America Profit Center of TTE Corporation, met with Catherine Bohigian, Legal Advisor to now Chairman Martin, on March 16, 2005 concerning the July 1, 2006 deadline by which cable operators are prohibited from sale or lease of integrated cable set top boxes under current FCC regulations implementing Section 629 of the Communications Act.

During the meeting, we reiterated the fundamental importance of the principle of common reliance by cable operators and consumer electronics manufacturers in achieving a competitive marketplace for navigation devices as mandated by the Congress. We further maintained that yet another delay in the implementation date was not necessary to facilitate the availability of a downloadable security solution. To the contrary, retaining the July 1, 2006 deadline actually would serve as a catalyst to development of a downloadable security solution that would be employed by cable operators and consumer electronics manufacturers alike.

In the event that the Commission were to determine that yet another extension of the deadline was warranted, we discussed conditions, including specific

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enforceable milestone requirements, on the grant of any such extension designed to achieve the goals of Section 629 and the timely conclusion of the DTV transition.

During the meeting, we also discussed the NPRM in ET Docket No. 05-24. We described multiple problems associated with the interim 50% requirement of the DTV tuner mandate, including the lack of manufacturer control over DTV product sales and difficulties of enforcement. For those reasons, we indicated that eliminating the interim 50% requirement for DTV receivers with screen sizes 25 inches to 36 inches, and establishing a new appropriate date for the 100% requirement would be beneficial to the DTV transition. We also updated Ms. Bohigian on TTE's product plans in that regard, specifically noting the introduction of the 27-inch RCA SDTV fully integrated receiver later this year.

This letter is being filed pursuant to Section 1.1206(b)(2) of the Commission's Rules.

Respectfully submitted,



Lawrence R. Sidman
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Catherine Bohigian, Legal Advisor to FCC Chairman Kevin Martin (via e-mail)